



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, N.Y. 10007

MICHAEL PESIN-VIROVETS  
*Senior Counsel*  
Office: (212) 356-2617  
Mobile: (646) 596-0583  
Email: mpvirove@law.nyc.gov

April 20, 2023

**BY ECF**

Honorable Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Payamps v. City of New York, et al.  
22-CV-00563 (AMD) (VMS)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing defendants the City of New York ("City"), Mayor Bill de Blasio, Commissioner Dermot Shea, NYPD Chief of Department Terence Monahan, Police Officer Daniel Auguste, Police Officer Corey Johnson, and Inspector Jesse Lance (collectively "defendants") in the above-referenced matter. The parties write jointly pursuant to the Court's Order, dated April 11, 2023, directing the parties to submit a letter with a proposed revised global discovery schedule for the Court's consideration. The parties respectfully propose the following schedule:

- Fact Discovery to be completed by: **July 30, 2023**
- Plaintiff to file amended complaint by: **July 30, 2023**
- Expert Discovery to be completed by: **September 28, 2023**

The parties thank the Court for its consideration of this request.

By: /s/ [Signature]  
Michael Pesin-Virovets  
*Senior Counsel*

cc: **By ECF**

Elena Louisa Cohen  
Cohen Green PLLC  
*Attorney for Plaintiff*

Remy Green  
Cohen & Green  
*Attorney for Plaintiff*

Jessica S. Massimi  
99 Wall Street, Ste. 1264  
New York, NY 10005  
*Attorney for Plaintiff*

Gideon Orion Oliver  
Attorney at Law  
277 Broadway  
Suite 1501  
New York, NY 10007  
*Attorney for Plaintiff*